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Attorney for Plaintiffs Daniel Grumbine and Graham Bottrell, Jr.

IN RE		
NICHOLAS L. AZEGLIO JR.	:	UNITED STATES BANKRUPTCY COURT
	:	FOR THE DISTRICT OF NEW JERSEY
	:	
Debtors.	:	CASE NO. 09-16476 (JHW)
	:	
DANIEL K. GRUMBINE and	:	CHAPTER 7
GRAHAM P. BOTTRELL, JR.	:	
	:	Honorable Judith H. Wizmur
Plaintiffs,	:	
vs.	:	Adversary Proceeding No. 09-1914 (JHW)
NICHOLAS L. AZEGLIO JR.,	:	
	:	Hearing Date: 9/14/09, 10:00 a.m.
Defendant.	:	ORAL ARGUMENT REQUESTED

NOTICE OF MOTION FOR SUMMARY JUDGMENT,
HOLDING DEBT NON-DISCHARGEABLE FOR FRAUD
UNDER 11 U.S.C. § 523(a)(2)(A)

TO:

Nicholas S. Herron, Esq.
Law Offices of Seymour
Wasserstrum
205 W. Landis Avenue
Vineland, New Jersey 08360
Counsel for Defendant

Barry Sharer
1103 Laurel Oak Road
Suite 105B
Voorhees, NJ 08043
Chapter 7 Trustee

PLEASE TAKE NOTICE that on Monday, **September 14th, 2009 at 10:00 a.m.**, in the forenoon or as soon thereafter as counsel may be heard, the undersigned attorney for the Plaintiffs, Daniel K. Grumbine and Graham P. Bottrell, shall apply to the United States

Bankruptcy Court, District of New Jersey, Camden Vicinage, 401 Market Street, Camden, New Jersey, for an Order:

a. GRANTING the Plaintiffs' Motion for Summary Judgment holding Debtor's Debt to the Plaintiffs Non-Dischargeable pursuant to 11 U.S.C. 523(a)(2)(A), under Count One of Plaintiffs' Complaint, due to the Debtor's fraud.

b. Any such other relief which the Court may deem equitable and just.

PLEASE TAKE FURTHER NOTICE that all opposition to the Motion must be in writing and filed with the Clerk of the Court, with a copy served upon movant's counsel, whose name and address are set forth above, within the time required by the rules governing the Court.

PLEASE TAKE FURTHER NOTICE that if written opposition is not timely filed and served this Motion shall be deemed uncontested and the relief requested may be granted without the need for a hearing.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, movant shall rely upon the annexed Plaintiff's Certified Statement of Material Facts, all Exhibits annexed thereto, and Memorandum of Law submitted herewith.

A proposed form of Order is filed and served herewith.

Movant requests oral argument.

Respectfully Submitted,

s/ Thomas M. North, Esq.

Thomas M. North
Attorney for Plaintiffs